

**COVINGTON & BURLING**

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April 14, 1994

**VIA FEDERAL EXPRESS**

Arnold Bernas, Project Manager  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency  
Region II, Room 2930  
26 Federal Plaza  
New York, New York 10278

Dear Mr. Bernas:

Enclosed is the response of The Goodyear Tire & Rubber Company ("Goodyear") to the Environmental Protection Agency's Request for Information received on February 21, 1994. We have answered this request to the best of our ability, however, the nature of Goodyear's retail operations is such that no relevant documents have been located. In particular, Goodyear's records retention policy for retail stores requires that invoices be retained for four years. Vendor payment invoices and manifests are retained for, at most, six years. Thus, Goodyear simply does not have adequate information to answer many of the Agency's requests. Where sufficient information or knowledge exists, Goodyear has approximated to the best of its ability. Without sufficient information, however, Goodyear declines to hazard suppositions. If upon discovery of new documents Goodyear is better able to answer the agency's questions, we will promptly do so.

Goodyear also objects to providing residential addresses and telephone numbers for its present and former employees. Such persons can be contacted through Goodyear's legal department. We recognize that we are under a continuing obligation to supplement our response, and will provide new information, if any, as it becomes available.

Each and every general objection listed above applies to every response set forth unless otherwise explicitly waived by Goodyear. With the exception of

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Mr. Arnold Bernas  
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question number 1, the remaining questions are answered on a per facility basis. That is, we have provided a separate response to questions two through five for each facility.

If you have any questions regarding this submission, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Corinne A. Goldstein", written in a cursive style.

Corinne A. Goldstein

cc: Elena T. Kissel, Assistant Regional Counsel, EPA

Enclosure

COVINGTON & BURLING

Mr. Arnold Bernas

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bcc: Mr. Bertram Bell, Esq.

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## RESPONSE TO INFORMATION REQUEST

This document responds to the Environmental Protection Agency's Request for Information. Goodyear has answered this request to the best of its ability, however, the nature of Goodyear's retail operations is such that no relevant documents have been located. In particular, Goodyear's records retention policy for retail stores requires that invoices be retained for four years. Vendor payment invoices and manifests are retained for, at most, six years. Thus, Goodyear simply does not have adequate information to answer many of the Agency's requests. Where sufficient information or knowledge exists, Goodyear has approximated to the best of its ability. Without sufficient information, however, Goodyear declines to hazard suppositions. If upon discovery of new documents Goodyear is better able to answer the agency's questions, we will promptly do so.

Goodyear also objects to providing residential addresses and telephone numbers for its present and former employees. Such persons can be contacted through Goodyear's legal department. We recognize that we are under a continuing obligation to supplement our response, and will provide new information, if any, as it becomes available.

### Question No. 1

- a. The Goodyear Tire & Rubber Company  
1144 East Market Street  
Akron, Ohio 44316-0001
- b. Goodyear is a corporation organized under the laws of Ohio.
- c. Stanley C. Gault  
Chairman of the Board, Chief Executive Officer  
1144 East Market Street  
Akron, Ohio 44316-0001
- d. James Boyazis  
1144 East Market Street  
Akron, Ohio 44316-0001

Hoyt M. Wells  
President  
1144 East Market Street  
Akron, Ohio 44316-0001

CT Corporation System  
1633 Broadway  
New York, New York 10019

- e. Goodyear has approximately 184 subsidiaries, none of which is located near the York Oil Site. A list of the significant subsidiaries, as defined in paragraph (ii) of Part 22 of Item 601(b) of Regulation S-K, as well as a copy of Goodyear's 1993 Annual Report are attached. Goodyear has not produced a list of the names and addresses of the Chief Executive Officers, presidents and Chairpersons of the Board of these subsidiaries because the task would be unduly burdensome, the information is irrelevant to respond to a release or threatened release of a hazardous substance, pollutant, or contaminant at the York Oil Site, or to otherwise enforce the provisions of CERCLA, and the information would not lead to the discovery of information to respond to a release or threatened release of hazardous substances at the York Oil Site.
- f. Not applicable.

Facility No. 1

Question No. 2

Goodyear Auto Service Center #1121  
424 East Water Street  
Syracuse, NY 13202

- a. Yes, this facility changed oil in motor vehicles during the applicable period.
- b. Both types of vehicles were serviced. Goodyear has no documents indicating the percentages of cars and trucks that were serviced. Past recollection indicates, however, that approximately 85% were cars and 15% were trucks.
- c. No, the facility did not service a particular brand of vehicle.
- d. Goodyear does not have any records indicating the number of oil changes performed each month. However, past recollection indicates that approximately 150 oil changes may have been performed a month, yielding approximately four and one-half quarts of oil during each oil change, for an approximate total of 169 gallons of oil every month.
- e. Goodyear has no documents indicating whether the number of vehicles serviced changed seasonally. Based on past recollection, however, it appears that the number of vehicles serviced may have increased by approximately 20% during the summer.
- f. Removed oil was stored in a tank.
- g. The tank was a steel tank with no liner.
- h. This tank is no longer in existence.
- i. The steel tank was located inside the first service bay.
- j. The steel tank was below ground.
- k. Goodyear has no record that any other substances were put into the steel tank, but it is possible that some transmission fluids may have been placed there as well.
- l. A tanker truck stopped by the facility periodically and pumped the used oil from the underground tank into the tanker. Goodyear has no records and no knowledge concerning the ultimate destination of the used oil.
- m. Goodyear transacted business with Seitz Oil for the disposal of the used oil. However, Goodyear has no knowledge or information regarding the type of waste oil,

the amount of waste oil, specific persons who removed the oil, or the location to which the oil was transported.

- n. Used oil was disposed of. Goodyear did not analyze the used oil and has no information concerning its characteristics and contents.
- o. Goodyear presently is unaware of any testing which may have been done on any waste oil that was disposed of during the applicable period or at any other time.
- p. Goodyear does not have any information or knowledge to answer this question.
- q. Goodyear does not believe and has no records indicating that any oil was removed by Peirce Oil Company, Peirce Brothers Oil Services, York Oil or any agents, employees, or independent contractors of these entities.

Question No. 3

Goodyear does not possess any documents that relate to the transportation, treatment, storage or disposal of waste oil from this facility during the applicable period.

Question No. 4

Goodyear believes that it was paid for waste oil, however, no records of any such transactions or of any financial arrangements for disposal exist.

Question No. 5

Goodyear is unable to identify persons who may have knowledge of facts relating to the generation, handling, transportation, storage or disposal of waste oil by this facility except those listed in our answer to question No. 6. Goodyear will supplement this Response if such information becomes available.

Question No. 6

The answers to the above questions were formulated with assistance from the following individuals:

David Laskey - all questions

Former Assistant Service Manager at facility (6-12/65), Area Sales Representative (1-8/66), Assistant Store Manager at facility (8/66 - 11/67)

Stephen Ramie - all questions

Current Store Manager

Joe Shaw - all questions

Former Office Manager at facility (1/70 - 3/73)



Facility No. 2

Question No. 2

Goodyear Auto Service Center #1120  
72 Henry Street  
Binghamton, NY 13901

- a. Yes, this facility changed oil in motor vehicles during the applicable period.
- b. Both types of vehicles were serviced. Goodyear has no documents indicating the percentages of cars and trucks that were serviced. Past recollection indicates, however, that approximately 80% were cars and 20% were trucks.
- c. No, the facility did not service a particular brand of vehicle.
- d. Goodyear does not possess any records indicating the number of oil changes performed each month. However, past recollection indicates that approximately 250 oil changes may have been performed a month, yielding approximately five quarts of oil during each oil change, for an approximate total of 312 gallons of oil every month.
- e. Goodyear has no documents indicating whether the number of vehicles serviced changed seasonally. Based on past recollection, however, it appears that the number of vehicles serviced may have increased during the summer. Goodyear has no knowledge of the size of the increase.
- f. Removed oil was stored in fifty-five gallon drums.
- g. The drums were steel drums with no liners.
- h. These drums are no longer in existence.
- i. The steel drums were located inside the rear of the store.
- j. The steel drums were above ground.
- k. No other substances were placed in the steel drums.
- l. A tanker truck stopped by the facility periodically and pumped the used oil from the steel drums into the tanker. Goodyear has no knowledge or information concerning the ultimate destination of the used oil.
- m. Goodyear has no knowledge or information regarding entities the facility contracted with for the transport, removal, storage, treatment or disposal of the waste oil, the

type of waste oil, the amount of waste oil, specific persons who removed the oil, or the location to which the oil was transported.

- n. Used oil was disposed of. Goodyear did not analyze the used oil and has no information concerning its characteristics and contents.
- o. Goodyear does not believe that any testing of the chemical content of the waste oil occurred.
- p. Goodyear does not believe that any of the waste oil removed was recycled oil.
- q. Goodyear does not believe and has no records indicating that any oil was removed by Peirce Oil Company, Peirce Brothers Oil Services, York Oil or any agents, employees, or independent contractors of these entities.

Question No. 3

Goodyear does not possess any documents that relate to the transportation, treatment, storage or disposal of waste oil from this facility during the applicable period.

Question No. 4

Goodyear believes that it was paid for waste oil, however, no records of any such transactions or of any financial arrangements for disposal exist.

Question No. 5

Goodyear is unable to identify persons who may have knowledge of facts relating to the generation, handling, transportation, storage or disposal of waste oil by this facility except those listed in our answer to question No. 6. Goodyear will supplement this Response if such information becomes available.

Question No. 6

The answers to the above questions were formulated with assistance from the following individuals:

Christopher Arnold - all questions  
Current Store Manager of facility

George Appleman - all questions  
Auto Technician at facility (1966 to present)

Facility No. 3

Question No. 2

Goodyear Auto Service Center #1123  
Camillus Plaza  
Camillus, New York

This store closed on August 30, 1985.

- a. Yes, this facility changed oil in motor vehicles during the applicable period.
- b. Both types of vehicles were serviced. Goodyear has no documents indicating the percentages of cars and trucks that were serviced. Past recollection indicates, however, that approximately 90% were cars and 10% were trucks.
- c. No, the facility did not service a particular brand of vehicle.
- d. Goodyear does not possess any records indicating the number of oil changes performed each month. However, past recollection indicates that approximately 130 oil changes may have been performed a month, yielding approximately four and one-half quarts of oil during each oil change, for an approximate total of 146 gallons of oil every month.
- e. The number of vehicles receiving oil changes did not vary seasonally.
- f. Removed oil was stored in a tank.
- g. The tank was steel and did not have a liner.
- h. This tank is no longer in existence.
- i. The steel tank was located behind the store's stockroom.
- j. The steel tank was below ground.
- k. Goodyear has no record that any other substances were put into the steel tanks, but it is possible that some transmission fluids may have been placed there as well.
- l. Goodyear has no knowledge or information concerning the disposal or the ultimate destination of the used oil.
- m. Goodyear has no knowledge or information regarding entities the facility contracted with for the transport, removal, storage, treatment or disposal of the waste oil, the

type of waste oil, the amount of waste oil, specific persons who removed the oil, or the location to which the oil was transported.

- n. Used oil was disposed of. Goodyear did not analyze the used oil and has no information concerning its characteristics and contents.
- o. Goodyear does not believe that any testing of the chemical content of the waste oil occurred.
- p. Goodyear does not believe that any of the waste oil removed was recycled oil.
- q. Goodyear does not believe and has no records indicating that any oil was removed by Peirce Oil Company, Peirce Brothers Oil Services, York Oil or any agents, employees, or independent contractors of these entities.

Question No. 3

Goodyear does not possess any documents that relate to the transportation, treatment, storage or disposal of waste oil from this facility during the applicable period.

Question No. 4

Goodyear believes that it was paid for waste oil, however, no records of any such transactions or of any financial arrangements for disposal exist.

Question No. 5

Goodyear is unable to identify persons who may have knowledge of facts relating to the generation, handling, transportation, storage or disposal of waste oil by this facility except those listed in our answer to question No. 6. Goodyear will supplement this Response if such information becomes available.

Question No. 6

The answers to the above questions were formulated with assistance from the following individual:

Joe Shaw - all questions  
Former Store Manager of facility (4/73 - 4/85)

Facility No. 4

Question No. 2

Goodyear Auto Service Center #1131  
2801 Brewerton Road  
Mattydale, NY 13211

This facility opened in 1965.

- a. Yes, this facility changed oil in motor vehicles during the applicable period.
- b. Both types of vehicles were serviced. Goodyear has no documents indicating the percentages of cars and trucks that were serviced. Past recollection indicates, however, that approximately 85% were cars and 15% were trucks.
- c. No, the facility did not service a particular brand of vehicle.
- d. Goodyear does not possess any records indicating the number of oil changes performed each month. However, recollection of former employees indicates that approximately 130 oil changes were performed a month, yielding approximately four and one-half quarts of oil during each oil change, for an approximate total of 146 gallons of oil every month.
- e. The number of vehicles receiving oil changes did not vary seasonally.
- f. Removed oil was stored in a tank.
- g. Goodyear has no knowledge or information regarding the type of tank, or whether the tank was lined.
- h. The tank is no longer in existence.
- i. Goodyear has no knowledge or information regarding the specific location of the tank.
- j. The tank was above ground.
- k. Goodyear has no record that any other substances were put into the tank, but it is possible that some transmission fluids may have been placed there as well.
- l. Goodyear has no knowledge or information concerning the disposal or the ultimate destination of the used oil.
- m. Goodyear has no knowledge or information regarding entities the facility contracted with for the transport, removal, storage, treatment or disposal of the waste oil, the

type of waste oil, the amount of waste oil, specific persons who removed the oil, or the location to which the oil was transported.

- n. Used oil was disposed of. Goodyear did not analyze the used oil and has no information concerning its characteristics and contents.
- o. Goodyear presently is unaware of any testing which may have been done on any waste oil that was disposed of during the applicable period or at any other time.
- p. Goodyear does not have any information or knowledge to answer this question.
- q. Goodyear does not believe and has no records indicating that any oil was removed by Peirce Oil Company, Peirce Brothers Oil Services, York Oil or any agents, employees, or independent contractors of these entities.

Question No. 3

Goodyear does not possess any documents that relate to the transportation, treatment, storage or disposal of waste oil from this facility during the applicable period.

Question No. 4

Goodyear believes that it was paid for waste oil, however, no records of any such transactions or of any financial arrangements for disposal exist.

Question No. 5

Goodyear is unable to identify persons who may have knowledge of facts relating to the generation, handling, transportation, storage or disposal of waste oil by this facility except those listed in our answer to question No. 6. Goodyear will supplement this Response if such information becomes available.

Question No. 6

The answers to the above questions were formulated with assistance from the following individual:

Joe Shaw - all questions  
Former Credit Sales Manager at facility (11/68 - 12/69)

Facility No. 5

Question No. 2

Goodyear Auto Service Center #1137  
5884 East Circle Drive  
Cicero, NY

~~This store opened in 1969.~~

- a. Yes, this facility changed oil in motor vehicles during the applicable period.
- b. Both types of vehicles were serviced. Goodyear has no documents indicating the percentages of cars and trucks that were serviced. Past recollection indicates, however, that approximately 90% were cars and 10% were trucks.
- c. No, the facility did not service a particular brand of vehicle.
- d. Goodyear does not have any records indicating the number of oil changes performed each month. However, past recollection indicates that approximately 200 oil changes may have been performed a month, yielding approximately five quarts of oil during each oil change, for an approximate total of 250 gallons of oil every month.
- e. Goodyear has no documents indicating whether the number of vehicles serviced changed seasonally. Based on past recollection, however, it appears that the number of vehicles serviced decreased during the winter. Goodyear has no knowledge of the size of the decrease.
- f. Removed oil was placed in a roll-around waste oil container, then stored in an underground tank.
- g. The container was made of metal, however Goodyear has no knowledge or information regarding the specific type of metal, or whether the container was lined.
- h. This tank is still in existence, however, it is no longer in use.
- i. The tank was located behind the back bays.
- j. The tank was below ground.
- k. Goodyear believes that transmission fluid was placed in the tank and waste antifreeze may have been placed in the tank, however, Goodyear has no record of the quantities of transmission fluid and waste antifreeze, if any, that were placed in the tank.

- l. A waste hauler stopped by the facility periodically and picked up the used oil from the underground tank. Goodyear has no knowledge or information concerning the ultimate destination of the used oil.
- m. Goodyear has no knowledge or information regarding entities the facility contracted with for the transport, removal, storage, treatment or disposal of the waste oil, the type of waste oil, the amount of waste oil, specific persons who removed the oil, or the location to which the oil was transported.
- n. Used oil was disposed of. Goodyear did not analyze the used oil and has no information concerning its characteristics and contents
- o. No testing of the chemical content of the waste oil occurred.
- p. Goodyear does not have any information or knowledge to answer this question.
- q. Goodyear does not believe and has no records indicating that any oil was removed by Peirce Oil Company, Peirce Brothers Oil Services, York Oil or any agents, employees, or independent contractors of these entities.

Question No. 3

Goodyear does not possess any documents that relate to the transportation, treatment, storage or disposal of waste oil from this facility during the applicable period.

Question No. 4

Goodyear believes that it was paid for waste oil, however, no records of any such transactions or of any financial arrangements for disposal exist.

Question No. 5

Goodyear is unable to identify persons who may have knowledge of facts relating to the generation, handling, transportation, storage or disposal of waste oil by this facility except those listed in our answer to question No. 6. Goodyear will supplement this Response if such information becomes available.

Question No. 6

The answers to the above questions were formulated with assistance from the following individual:

James G. Thomas - all questions  
Former Manager at facility (1974 - 1978)



Facility No. 6

Question No. 2

Goodyear Auto Service Center #1130  
3681 Erie Boulevard East  
DeWitt, NY

~~This facility was a very small store with no service facilities available. The facility did not provide oil changes, and closed on August 21, 1963.~~

Facility No. 7

Question No. 2

Goodyear Wholesale Tire Center, #1187  
530 Deere Road  
Syracuse, NY

This facility opened in 1976 and is a wholesale tire center. It has never provided any oil changes.

The subsidiary companies of The Goodyear Tire & Rubber Company at March 20, 1994, and the places of incorporation or organization thereof, are:

<u>Name of Subsidiary</u>	<u>Place of Incorporation or Organization</u>
Air Treads Inc.	Georgia
All American Pipeline Company	Texas
Brad Ragan, Inc.	North Carolina
Celeron Corporation	Delaware
Celeron Gathering Corporation	Delaware
Celeron Trading & Transportation Company	Delaware
Cosmoflex, Inc.	Delaware
Divested Atomic Corporation	Delaware
Divested Companies Holding Company	Delaware
Divested Litchfield Park Properties, Inc.	Delaware
Goodyear Energy Inc.	Arizona
Goodyear International Corporation	Delaware
The Goodyear Rubber Plantations Company	Delaware
Goodyear Western Hemisphere Corporation	Ohio
The Kelly-Springfield Tire Company	Delaware
Lee Tire & Rubber Company	Maryland
Murphy's Inc., Sales and Service	Ohio
Wingfoot Corporation	California
Wingfoot Ventures Seven Inc.	Delaware
Wingfoot Ventures Eight Inc.	Delaware
Wingfoot Ventures Nine Inc.	Delaware
Wingfoot Ventures Ten Inc.	Delaware
Compania Anonima Goodyear de Venezuela	Venezuela
Compania Goodyear del Peru, S.A.	Peru
Companhia Goodyear do Brasil Produtos de Borracha Ltda	Brazil
Compania Hulera Goodyear—Oxo, S.A. de C.V.	Mexico
Corporacion Industriales Mercurio, S.A. de C.V.	Mexico
Deutsche Goodyear Holdings GmbH	Germany
Deutsche Goodyear GmbH	Germany
Goodyear Australia Limited	Australia
Goodyear Canada Inc.	Canada
Goodyear Chemicals, Europe S.A.	France
Goodyear de Chile S.A.I.C.	Chile
Goodyear de Colombia S.A.	Colombia
Goodyear Broker's Limited	Bermuda
Goodyear Espanola S.A.	Spain
Goodyear Export, S.A.	Bermuda
Goodyear Export Sales Corporation	U.S. Virgin Islands
Goodyear France (Pneumatiques) S.A.	France
Goodyear Finance Holding S.A.	Luxembourg
Goodyear Great Britain Limited	England
Goodyear Hellas S.A.I.C.	Greece
Goodyear Holding Co.	Venezuela
Goodyear India Limited	India

<u>Name of Subsidiary</u>	<u>Place of Incorporation or Organization</u>
Goodyear Italiana S.p.A.	Italy
Goodyear Jamaica Limited	Jamaica
Goodyear Lastikleri Turk Anonim Sirketi	Turkey
Goodyear Malaysia Berhad	Malaysia
Goodyear Maroc S.A.	Morocco
Goodyear (Nederland) B.V.	Netherlands
Goodyear New Zealand, Ltd.	New Zealand
The Goodyear Orient Company Pte Limited	Singapore
Goodyear Portuguesa, Limited	Portugal
Goodyear Philippines Inc.	Philippines
Goodyear S.A.	France
Goodyear S.A.	Luxembourg
Goodyear Singapore Pte Limited	Singapore
Goodyear (Suisse), S.A.	Switzerland
Goodyear Taiwan Limited	Republic of China
Goodyear (Thailand) Limited	Thailand
Goodyear Zimbabwe (Private) Limited	Zimbabwe
Gran Industria de Neumaticos Centroamericana, S.A.	Guatemala
Granford Manufacturing, Inc.	Canada
Gummiwerke Fulda GmbH	Germany
Neumaticos Goodyear S.A.	Argentina
Nippon Goodyear Kabushiki Kaisha	Japan
Philippine Rubber Project Company, Inc.	Philippines
P.T. Goodyear Indonesia	Indonesia
P.T. Goodyear Sumatra Plantations	Indonesia
S.A. Goodyear N.V.	Belgium
Svenska Goodyear Aktiebolag	Sweden

- (1) Each of the 71 subsidiaries named in the foregoing list conducts its business under its corporate name and, in a few instances, under a shortened form of its corporate name.
- (2) Each of the 71 subsidiaries named in the foregoing list is directly or indirectly wholly-owned by Registrant, except that in respect of each of the following subsidiaries Registrant owns the indicated percentage of such subsidiary's equity capital: Brad Ragan, Inc. 74.5%; Compania Goodyear del Peru S.A., 78%; Goodyear India Limited, 59.9%; Goodyear Jamaica Limited, 60%; Goodyear Lastikleri Turk Anonim Sirketi, 50.8%; Goodyear Malaysia Berhad, 51%; Goodyear Maroc S.A., 55%; Goodyear Taiwan Limited, 75.5%; Goodyear (Thailand) Limited, 58.5%; Gran Industria de Neumaticos Centroamericana, S.A., 75.8%; P.T. Goodyear Indonesia, 85%; and Goodyear Philippines Inc., 69%.
- (3) In accordance with paragraph (ii) of Part 22 of Item 601(b) of Regulation S-K, the names of approximately 118 subsidiaries have been omitted from the foregoing list. The unnamed subsidiaries, considered in the aggregate as a single subsidiary, would not constitute a significant subsidiary, as defined in the applicable regulations.



*1993 Annual Report*

**The Goodyear Tire & Rubber Company**